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May 7, 2010

Susan M. Hudson, Clerk
Vermont Public Service Board
112 State Street
Montpelier, VT 05620-2701

Re: Docket 7466 Comments of the Department of Public Service on Group A and Group B recommendations, and Group C issues

Dear Ms. Hudson:

On April 20, 2010, the Public Service Board (Board) issued an Order requesting comments in Docket 7466 regarding Group A and Group B recommendations, and Group C issues. The Department of Public Service (Department) is pleased to offer the following comments.

In regards to Group A and Group B recommendations, the Department offers no additional comments at this time. The recommendations were a consensus of the particular groups in which the Department participated, except as where noted in those recommendations.

Group C (initially assigned to Board staff) was tasked with addressing “issues associated with making an appropriate level of customer-specific information concerning projects publicly available while protecting competitively sensitive information, including what level of detail is appropriate to make publicly available, and what information regarding this issue should be included in an Order of Appointment.”

The dissemination of information learned through the implementation of efficiency measures in homes and businesses is a key principle of efficiency delivery in Vermont. According to VEIC’s filing of January 29, at least 37% of business customers in every year since 2005 (and many more in some years) have agreed to share information regarding their project in “Efficiency Vermont publications and promotions.” The Department suggests that it may be possible that information regarding these projects could be better made available – for example a listing of those completed projects on a website or the hosting of a forum for businesses specifically to share ideas and projects. Further, stakeholders should have discussions on how to increase the percentage of projects with shared information significantly. Those discussions can occur



outside the context of this Docket.

In regards to an Order of Appointment, the Department refers to language that has been included in all versions of a Draft Recommendation, has been unchanged for some time (for instance, in Part I.1.Q of VEIC Exhibit BH-4 in this Docket), and should be included in the first draft of the entity-specific Order of Appointment being developed by the parties:

An EEU shall provide general information to the public to as part of a strategy to (1) increase consumer awareness and understanding of the benefits of reducing energy use, and the best technologies available to them and (2) refer them to information and service resources other than the EEU.

The Department suggests that this language, in an entity's specific Order of Appointment, provides the framework for disseminating information learned through the implementation of efficiency measures in homes and businesses. It also provides flexibility for an EEU to best protect the confidentiality wishes of its customers. When setting non-resource acquisition budgets in the Demand Resource Plan and developing Quantitative Performance Indicators to measure performance, stakeholders can identify specific actions that an EEU should take that may further disseminate information and facilitate the sharing of ideas and efficiency strategies. Thus, further detail in an Order of Appointment regarding this issue is not necessary.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Walter', followed by a long horizontal flourish.

Walter (TJ) Poor
Energy Program Specialist
Department of Public Service
802-828-0544